

In the Matter Of:

Department of Natural Resources & Environmental Control

Allen Harim Water Allocation Permit Renewal

Public Hearing

March 24, 2021

Wilcox & Fetzer

1330 King Street

Wilmington, DE 19801

email: depos@wilfet.com, web: www.wilfet.com

phone: 302-655-0477. fax: 302-655-0497



DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

RE: Allen Harim Water Allocation)
Permit Renewal, Public Hearing)
Docket #2020-P-W-0029)

.. .. .

Virtual Public Hearing
Dial-In Number: 1-408-418-9388
Event Number: 179 211 7396

Wednesday, March 24, 2021
6:00 p.m.

.. .. .

BEFORE: Theresa Newman, Hearing Officer

FOR THE DIVISION: Patricia Murray, DNREC
Matthew Grabowski, DNREC

-- Transcript of Proceedings --

WILCOX & FETZER
Registered Professional Reporters
1330 King Street - Wilmington, Delaware 19801
(302) 655-0477
www.wilfet.com

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TABLE OF CONTENTS

	Page
Introduction by Ms. Newman.	3
Presentation by Patricia Murray	9
Entry of Exhibits 1 through 12	15
Allen Harim comment by Amber Moore.	15
Public Speakers:	
Keith Steck	19
Maria Payan	22
Anthony John Scarpa	25
Shelly Cohen	27
Conclusory Remarks by Ms. Newman.	30
Certificate of Reporter	31



1 MS. NEWMAN: Good evening. I
2 believe everyone is now connected and ready,
3 so we will begin the virtual public hearing.

4 Thank you all for taking the time
5 out of your busy schedules to connect with us
6 today.

7 Today is Wednesday, March 24, 2021,
8 and the time is now 6:00 p.m.

9 We are here this evening to provide
10 a virtual platform for the State of
11 Delaware's Department of Natural Resources
12 and Environmental Control to conduct its
13 virtual public hearing on the permit
14 application submitted by Allen Harim Foods
15 LLC for a water allocation permit renewal.

16 My name is Theresa Newman, and
17 Secretary Garvin has appointed me to serve as
18 the hearing officer for tonight's formal
19 proceeding.

20 There have been changes made to
21 DNREC's standard hearing protocols,
22 necessitated by Delaware's ongoing state of
23 emergency due to the COVID-19 pandemic.

24 First and foremost, this hearing is



1 being conducted virtually. No one is
2 together in the same room. Everyone is
3 participating independently at their own
4 respective locations.

5 While we are not physically
6 gathered tonight, WebEx does generate a list
7 of those that are virtually present for this
8 proceeding so that the Department can have
9 the same, have a record for those who have
10 electronically joined this event.

11 At the conclusion of these
12 introductory marks, I will be turning the
13 hearing over to Department staff and the
14 applicant to provide their presentations for
15 the record being generated in this matter.

16 Once the presentations conclude,
17 those persons who preregistered in advance of
18 this hearing will be acknowledged and
19 provided an opportunity to offer comment on
20 the proposed application in alignment with
21 DNREC's standard comment protocols.

22 There is a court reporter virtually
23 present who will prepare a verbatim
24 transcript of the hearing, pursuant to the



1 statutory requirement for DNREC to have the
2 same prepared.

3 That transcript will be posted on
4 the hearing webpage dedicated to this matter
5 as soon as it is received.

6 In addition, I would encourage
7 those who are attending tonight's hearing to
8 also visit the hearing webpage dedicated to
9 this matter for additional details concerning
10 proposed applications submitted by Allen
11 Harim Foods LLC.

12 The hearing webpage can be found
13 online under the Administrative Law Section
14 of DNREC's website that will be listed at the
15 conclusion of tonight's hearing.

16 Before we begin the presentation
17 tonight, please be advised that the following
18 protocols remain in place for all DNREC
19 public hearings.

20 All comment received must be
21 limited solely to the subject matter of
22 tonight's hearing. All comments pertinent to
23 the subject matter of this virtual hearing
24 will be incorporated into the record being



1 generated in this matter.

2 In order to ensure that everyone
3 who wishes to offer comment for the
4 Secretary's consideration is accommodated,
5 the record in this matter shall remain open
6 following tonight's proceeding through
7 Thursday, April 8, 2021.

8 There is one authentic record of
9 this formal proceeding tonight, and it is the
10 official court reporter's verbatim
11 transcript.

12 The statutory purpose of tonight's
13 hearing is to build a record with regards to
14 the proposed application before us tonight.

15 A record consisting of tonight's
16 hearing transcript, all written comments, all
17 exhibits, and eventually the Hearing
18 Officer's Report will be reviewed by
19 Secretary Garvin.

20 The Secretary will ultimately issue
21 an order following that review process
22 containing his decision on this matter and
23 the reasons therefor.

24 Per DNREC's standard hearing



1 protocols, there will be no Q and A or chat
2 session permitted during the hearing.

3 Those who preregistered to offer
4 verbal comments will be acknowledged to speak
5 at the conclusion of the presentation portion
6 of tonight's proceeding. Additional
7 instruction with regards to offering verbal
8 comment for tonight will be provided at that
9 time.

10 Lastly, it is important to note no
11 decision has already been made by the
12 Department, nor will any decision be made
13 tonight with regard to the proposed
14 application.

15 As previously stated, DNREC wishes
16 to ensure that everyone is enabled to offer
17 their comment for the inclusion into the
18 record being generated in this matter.

19 Therefore, the record will remain
20 open through Thursday, April 8, 2021, so that
21 the public may offer written comment, should
22 they wish to do so.

23 Comments may be submitted through a
24 comment form link on the hearing webpage, via



1 e-mail to DNRECHearingComments@delaware.gov,
2 or via the U.S. Postal Service at the
3 physical address for DNREC indicated on the
4 hearing webpage and/or public notices
5 previously issued for this matter.

6 Written comments to DNREC may not
7 be submitted using social media platforms
8 such as Twitter, Facebook, YouTube or text
9 messaging.

10 Please remember all comment
11 received either through USPS or via
12 electronic mechanisms just noted now, as long
13 as received by the Department on or before
14 April 8th, will bear the exact same weight
15 and will be considered equally by the
16 Secretary prior to making his decision final.

17 Lastly, the ultimate decision
18 regarding this matter is made by DNREC
19 Secretary Garvin. This formal proceeding
20 hearing acts as a mechanism to enable the
21 Department to thoroughly vet the application
22 matter to the public and to let the public
23 know the various ways to which comment may be
24 submitted for Secretary Garvin's



1 consideration if so desired.

2 I will now hand it over to
3 Mrs. Murray with the Division of Water to
4 provide the Department's presentation.

5 MS. MURRAY: Good evening. I'm
6 Patty Murray. I'm the Program Manager of the
7 Allocations Program. Next slide.

8 Theresa has already gone over this,
9 but we have a slide reminding everyone why
10 we're doing this electronically and virtually
11 tonight, and that is because of the order
12 that was done because of the pandemic. Next
13 slide.

14 So our purpose tonight is to
15 provide an opportunity for the public to
16 comment on the renewal of the existing water
17 allocation permit associated with Allen
18 Harim's Harbeson plant. The facility is also
19 requesting an increase in their allocation.

20 Their current allocation is one
21 million nine hundred thousand gallons per
22 day. They would like to increase it to two
23 million three hundred thousand gallons per
24 day.



1 They currently have
2 45 million gallons per month, and they would
3 like to up it to 54 million gallons per
4 month.

5 They have 525 billion gallons per
6 year, and they want to increase that to
7 578 million gallons -- billion gallons per
8 year.

9 Next slide.

10 This is a map of the project
11 location. This is actually a wellhead
12 protection map, because after 9/11 we were
13 not allowed to locate public or industrial
14 wells, so this is the map of the site.

15 Next slide: So this is the
16 existing wells that are on the allocation
17 currently. They have five wells that are all
18 screened in the Columbia aquifer.

19 They currently have treatment on
20 the unit for the groundwater prior to use,
21 and they actually wells two, four, five, and
22 seven are all for industrial use, and they
23 have a treatment unit prior to the use, and
24 they run sodium hydroxide in sync for the PH



1 to control the corrosive reduction for things
2 for iron and things like that.

3 Well three is only used for the
4 wastewater, and there is no prior treatment
5 on well three, as it is not needed.

6 And then -- well, this is all
7 explained in the permit. So those are all
8 the well capacities and what they use per
9 day.

10 Next slide. So both the allocation
11 permit was put on a 20-day notice period and
12 advertised in both newspapers, the Delaware
13 State News and the News Journal.

14 The comment period was extended,
15 since we had Thanksgiving in between that
16 time period. So we received one written
17 comment on November 30th. We received a
18 second notice of objection on December 8th.
19 And we had a third notice of objection when
20 the actual hearing was advertised in
21 February.

22 Next slide.

23 So the regulatory review is how we
24 normally do any kind of permit application



1 that comes in. It comes into our branch, and
2 then we conduct a review determining to make
3 sure that everything was complete for the
4 application, and then it will go through a
5 review of a hydrologist in our section. Next
6 slide.

7 This is all the information that
8 you need that Theresa has also gone over, but
9 it's here on the screen if you didn't get it
10 already or you haven't visited our public
11 webpage. So the -- oh, I was just going to
12 say that we had a hydro on the call tonight.

13 MS. NEWMAN: Ms. Murray, you said
14 that you have the hydro -- is it a
15 hydrologist?

16 MS. MURRAY: It is.

17 MS. NEWMAN: Okay. And who would
18 that be.

19 MS. MURRAY: That's Josh Casper,
20 who is on the call, as well.

21 MS. NEWMAN: Thank you. And does
22 Josh Casper have anything to add to the
23 presentation for the Department?

24 MS. MURRAY: No, he doesn't.



1 MS. NEWMAN: Okay. Thank you.

2 Does that conclude your presentation,
3 Ms. Murray?

4 MS. MURRAY: It does, except for my
5 exhibits.

6 MS. NEWMAN: Okay. You may go
7 ahead and proceed with the exhibits.

8 MS. MURRAY: So I would like to
9 enter into the record all of our 12 exhibits
10 that are currently already on the website.

11 So Exhibit 1 is the application.
12 And then we have A, B, and C. So Exhibit 1A
13 is the pump test reports. Exhibit B1A is the
14 requested rates and well reports with test
15 data. And then 1C is the water conservation
16 and drop plans that were submitted.

17 Exhibit 3 -- Exhibit 2, I'm sorry,
18 is the public notice for the application
19 renewal.

20 Exhibit 3 are both legal affidavits
21 for the News Journal and the Delaware State
22 News.

23 Exhibit 4 is the public comment
24 received by Maria Payan.



1 Exhibit 5 is the public comment
2 received by Keith Steck.

3 And then Number 6 is the last
4 public comment that was submitted by Jenna
5 Atalia.

6 And then Exhibit 7 is the public
7 hearing, which was the legal notice for the
8 hearing, letting everyone know when it was
9 going to be.

10 Number 8, again, is both affidavits
11 for the News Journal and the State News for
12 the hearing notice.

13 Exhibit 9 is our updated public
14 hearing. We had a date correction that we
15 needed to do. The year was wrong. So we had
16 to -- we actually readvertised the hearing
17 just in case someone saw that it said 2020
18 instead of 2021. That's Exhibit 9.

19 And then Exhibit 10 is both
20 affidavits for the public notices rerun for
21 both the News Journal and the Delaware State
22 News.

23 Exhibit 11 is the Statewide Public
24 Meeting Calendar posting. That's necessary

1 so everyone can find it.

2 And then Exhibit 12 is the Power
3 Point presentation that I just went over.
4 And that's all.

5 MS. NEWMAN: Thank you, Ms. Murray.
6 For the record, I don't know if I missed it.
7 Did you provide Exhibit Number 10.

8 MS. MURRAY: The both affidavits,
9 yes.

10 MS. NEWMAN: Okay. Thank you.
11 Just making sure. I did receive all exhibits
12 1 through 12 electronically, and I do hereby
13 mark those exhibits as Department's Exhibits
14 1 through 12.

15 Does this conclude the Department's
16 presentation?

17 MS. MURRAY: Yes, it does.

18 MS. NEWMAN: Thank you. All right.
19 We are going to move on to the applicant to
20 provide a presentation. I believe,
21 Mrs. Moore, you will be providing a
22 presentation on behalf of the applicant; is
23 that correct?

24 MS. MOORE: That is correct.



1 MS. NEWMAN: Okay. You may proceed
2 with your presentation, Ms. Moore.

3 MS. MOORE: Actually, we don't have
4 a formal presentation, rather just a
5 statement we would like to make.

6 So on behalf of Allen Harim,
7 obviously Allen Harim has submitted an
8 application requesting renewal of its water
9 allocation permit.

10 Allen Harim believes that it has
11 supplied all of the information requested by
12 the Department, and it reaffirms its
13 commitment to implementing the latest
14 technology and practices for the continuous
15 improvement of all of its processes and
16 conducting its operations in an
17 environmentally sound manner.

18 Allen Harim believes that the
19 application complies with the objectives and
20 requirements of the applicable provisions of
21 the Delaware Code and the applicable
22 regulations, standards, and guidance set
23 forth thereunder.

24 Therefore, Allen Harim respectfully



1 requests that the Department issue the permit
2 as set forth in the application.

3 MS. NEWMAN: Okay. Ms. Moore, does
4 that conclude your verbal statement on behalf
5 of Allen Harim?

6 MS. MOORE: Yes, ma'am.

7 MS. NEWMAN: Thank you. Now that
8 the presentations have concluded, we will
9 turn our attention to those who
10 pre-registered for the opportunity to offer
11 verbal comment at tonight's hearing.

12 Per the protocol set forth on
13 DNREC's public hearing page, those wishing to
14 offer verbal comment during the virtual
15 hearing must have pre-registered with DNREC
16 no later than noon on the day of the hearing.

17 The order of those comments tonight
18 was established as a result of the
19 Department's pre-registration process.

20 All commenters must adhere to the
21 Department's protocols with regard to
22 offering verbal comment, including making
23 their comments as concise as possible,
24 respecting the three-minute time limit, and



1 limiting their comments to the subject matter
2 of this hearing.

3 There are five preregistered
4 commenters that will be called upon in the
5 following order to offer their verbal
6 comment.

7 First to speak will be Robert Dip,
8 second Keith Steck, third Maria Payan, fourth
9 Anthony John Scarpa, and lastly Shelly Cohen.

10 To assist the commenters with
11 regards to the amount of time they have,
12 there is a virtual, a visual timer that has
13 appeared on the screen that will allow --
14 that will count down three minutes.

15 When it is the speaker's turn to
16 comment, the speaker's audio will be unmuted.
17 Their identity will be confirmed, and the
18 timer will begin.

19 At the end of the three minutes,
20 the speaker's audio will be automatically
21 placed back on mute, and we will move on to
22 the next person to be acknowledged to offer
23 comment.

24 Please note that there is no live



1 video feed of the commenters, as they will
2 provide a comment by audio only. All
3 comments will be transcribed by the court
4 reporter and thereby incorporated into the
5 hearing record.

6 If the speaker is not able to
7 finish their comments within the three-minute
8 time period, the Department encourages you to
9 submit the completed comment in writing no
10 later than April 8th. No commenter will be
11 granted more than three minutes of time to
12 speak for any reason.

13 With that being said, may I have
14 Robert Dip unmute him, and please provide
15 your first and last name and who you are
16 representing before you begin your comment.

17 Based on the attendance list that
18 we have, we don't have a Robert Dip that is
19 available to provide a comment, so we will
20 move on to the second commenter.

21 Keith Steck, may I have Keith Steck
22 unmuted, and please state your first and last
23 name and who you are representing for the
24 record, and then you may begin your comment.



1 MR. STECK: Can you hear me?

2 MS. NEWMAN: Yes.

3 MR. STECK: Okay. My name is Keith
4 Steck. I'm speaking as the vice president of
5 the Delaware Coalition for Open Government,
6 DelCOG.

7 And I want to say thank you for the
8 opportunity to comment, first of all. I'm a
9 resident of Milton, Delaware, but, as I
10 mentioned, I'm speaking on behalf of DelCOG.

11 I'm doing so because of issues
12 regarding the process used to obtain public
13 comments. The early application process was
14 a -- I'll just call it a level of awkward.
15 Information was not provided. And so I want
16 to bring that up.

17 I want to begin by saying that
18 there are some similar issues now. There is
19 a missing document. There is a map that was
20 supposed to be provided as Appendix A, but I
21 did not see it in the package. I don't know
22 where it is.

23 I will also go on to say that
24 without that map, it's very difficult to



1 really make some comments. I don't know
2 whether the map got located and identified
3 where the wells are.

4 In absence of that map, I used
5 two -- I used the map from the presentation
6 for some slides that were presented here, and
7 I also used the one that I found in one of
8 the submissions, the Keep Our Wells Clean
9 submission. And I did that so that I could
10 understand where these maps, where these
11 facilities are.

12 I also find some inaccuracies in
13 the documents, one of which is in your
14 presentation, the line, the part that shows
15 the gallons per day per month and year. The
16 year amounts are millions, not billions. And
17 that's consistent with the application on --
18 I believe it's on item seven, page one. So I
19 want to make that known.

20 Also, there are some important
21 questions that came up looking at the
22 documentation. The sampling and test data
23 cover only a very short time frame, December,
24 from mid December 2018 to January 2019.



1 The record shows that it came up
2 about lead, copper and lead contamination
3 levels, and those are very concerning.

4 I'm probably going to run out of
5 time before I get through this, so I will
6 submit my comments in writing. But the
7 copper and lead levels are especially
8 disconcerting because of the potential for
9 impacting workers, also potentially impacting
10 consumers, and also potentially impacting the
11 environment.

12 MS. NEWMAN: Mr. Steck, your time
13 is now up, and you have been placed back on
14 mute. I thank you for your comment. We are
15 going to move forward. And, again, please be
16 sure to provide your written comment as
17 stated prior to, and there are the ways to
18 submit that.

19 So, moving on, we will go to Maria
20 Payan. Maria Payan, can we please have her
21 unmuted. And state your first and last name
22 and who you are representing for the record,
23 and you may begin your comment.

24 MS. PAYAN: My name is Maria Payan.



1 I'm a resident of Sussex County. I'm
2 submitting comments on behalf of Sussex
3 Health and Environmental Network, which is a
4 coalition of grass roots groups, including
5 Keep Our Wells Clean, which have submitted
6 comments to request a hearing.

7 Renewal versus modification: The
8 permit application materials provided to the
9 public in response to a FOIA included the
10 DNREC Water Allocation application form.

11 The form indicates it's for
12 renewal. The permit, however, and the
13 document titled "Attachment to Requested
14 Rates" appears that Allen Harim is requesting
15 an increase in water allocation to address
16 the increase in poultry production and
17 subsequent additional water needs.

18 The receipt dates for the permit
19 application materials, they have handwritten
20 receipt dates of May 24, 2019. However, the
21 DNREC receipts stapled to the permit app
22 shows the permit fee was paid February 25,
23 2019.

24 Where was the original application



1 submitted with the permit fee on February 25,
2 2019, or was the date stamp on the receipt
3 not correct? If there was an original one
4 and there was a letter of deficiency, that
5 should have been provided in the materials
6 for response, or I mean for the public
7 hearing, for public comment. Excuse me.

8 DNREC did not provide permit
9 application materials to the public until
10 Monday, November 30, 2020, when asked for an
11 extension. A one-week extension was
12 provided. Why does it take so long to
13 provide necessary information to the public?

14 The time taken by DNREC served only
15 to severely reduce the time the public can
16 actually read and comprehend and participate
17 with the permit materials for public comment.

18 I want to touch on the estimated
19 consumptive use. Allen Harim states only
20 2 percent of the total withdrawal would be
21 for consumptive use.

22 There is no type of information on
23 the treatment used for water withdrawn from
24 human consumption, nor is there indication of



1 which well would produce that water.

2 I also want to touch on the gallons
3 of water per bird process on page two of
4 attachment two. It says they'll process
5 50 million birds using 7.5 gallons per bird
6 and are now processing 81 million birds using
7 6.1.

8 The difference in total water was
9 calculated, but it doesn't seem to have a
10 calculation sheet or other mechanism for
11 DNREC or the public to evaluate the
12 reliability of that 6.1 gallon per bird
13 estimate.

14 The drought emergency plan, it
15 seems that this is barely generic without
16 much information. I think more should be
17 provided.

18 MS. NEWMAN: Ms. Payan, I'm sorry
19 to interrupt you. The three-minute timer has
20 gone up. So I do encourage you to submit
21 your written comment, as well, for the
22 record.

23 But we will now move on to Anthony
24 John Scarpa. Could I please have him

1 unmuted, and provide your first and last name
2 and who you are representing for the record,
3 and you may begin.

4 MR. SCARPA: Good evening. My name
5 is Anthony Scarpa. I represent Keep Our
6 Wells Clean, which is a grass roots citizens
7 group concerned about pollution and
8 contamination of rural wells, private wells
9 in Sussex County.

10 I have a fundamental question. It
11 goes back to this permit and also any other
12 permits that Allen Harim has been involved
13 with since 2018.

14 Secretary Garvin in 2018 assessed a
15 \$300,000 fine against Allen Harim. Has that
16 fine been paid? And, if not, why are we
17 having this hearing?

18 Because I believe if I, as a
19 citizen, did something that violated a DNREC
20 rule, shot a deer out of season, caught a
21 fish that I wasn't supposed to be catching,
22 or my septic system, overflowed it into a
23 stream or a creek, I would be fined, and I
24 wouldn't be given the slack that I believe



1 that Allen Harim has been given here.

2 They were supposed to have been
3 given an offset environmental project with
4 the Conservancy Group. I don't believe that
5 was ever done. The last time I checked with
6 the Conservancy Group, that wasn't done or
7 even attempted to be done.

8 So I'm not sure why we are here
9 tonight listening to this permit when, in
10 fact, I believe that Allen Harim still has an
11 outstanding fine that hasn't been paid for
12 the last three years.

13 So that's a question that I have,
14 that I would like to see DNREC, the Secretary
15 of DNREC, Shawn Garvin, respond to as well as
16 Allen Harim.

17 Thank you for your time.

18 MS. NEWMAN: Thank you, Mr. Scarpa.

19 We will now move on to our last
20 commenter, who is Shelly Cohen. If you could
21 please state your first and last name for the
22 record and who you are representing, and you
23 may begin your comment.

24 MS. COHEN: Hi. My name is Shelly

1 Cohen. I live in Milton, Delaware. And I
2 belong to SEN and also to Keep Our Wells
3 Clean.

4 I have been following the Allen
5 Harim situation for several years now when I
6 became aware of it, about more than four
7 years ago.

8 I'm kind of confused by not getting
9 the whole story. I would think that your
10 hydrologist that you invited to the meeting
11 tonight should have been speaking before, you
12 know, the commenters like myself, Maria, and
13 Tony and Keith.

14 But I'm also concerned -- I'm
15 concerned about the bigger picture here, too.
16 Like Mr. Scarpa said, there is unresolved
17 issues, decisions that should have been made
18 by Secretary Garvin. I don't think they have
19 been published or decided or whatever.

20 Allen Harim is not exactly a good
21 corporate neighbor. You are increasing their
22 water allocation, although your numbers are
23 wrong, but you're increasing the allocation.

24 But nobody said hey, how is this



1 water, how is this water, when it's being
2 used to process the slaughtering of chickens
3 and, you know, all that, well, where does it
4 go?

5 There was a problem with that
6 NPDES -- I always mispronounce this -- the
7 NPDES permit before. Is it still valid? Is
8 it active?

9 Because Allen Harim declined to
10 increase their water treatment to defer to
11 this pipeline situation with Artesian Water.

12 So it's like you have all these
13 loose, loose things. And you can say well,
14 we're only here for this water allocation
15 tonight. But all these other things make a
16 difference, too.

17 You know, it's like that old joke
18 about the elephant. Somebody is touching the
19 tail, somebody is touching the trunk, and
20 everybody thinks it's something different.

21 Well, this is the big elephant
22 chicken in the room. What's going on with
23 Allen Harim?

24 And there is also this other thing



1 about that I have heard that they have sold
2 the company. Who are you dealing with? I
3 don't think you're checking all your boxes.
4 And you're certainly not checking your math.
5 I will be submitting comments in the future.
6 Thank you.

7 MS. NEWMAN: Thank you, Mrs. Cohen.
8 That will now conclude the public comment
9 portion of tonight's hearing.

10 I want to thank you all for
11 providing your public comment. And, again,
12 for those who may not have been able to
13 provide their comment tonight or finish their
14 comment, you are able to provide a written
15 comment no later than Thursday, April 8th, to
16 which the record will remain open through.

17 I want to thank you all for
18 attending the virtual hearing tonight. It is
19 now 6:28, and the hearing is now concluded.
20 Thank you.

21 (Concluded at 6:28 p.m.)
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1 CERTIFICATE

2 I, Lorena J. Hartnett, a Notary Public and
3 Registered Professional Reporter, do hereby certify
4 that the foregoing is an accurate and complete
5 transcription of the proceeding held at the time and
6 place stated herein, and that the said proceeding
7 was recorded by me and then reduced to typewriting
8 under my direction, and constitutes a true record of
9 the testimony given by said witnesses.

10 I further certify that I am not a relative,
11 employee, or attorney of any of the parties or a
12 relative or employee of either counsel, and that I
13 am in no way interested directly or indirectly in
14 this action.

15 IN WITNESS WHEREOF, I have hereunto set my
16 hand and affixed my seal of office on this 31st day
17 of March 2021.

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22 Lorena J. Hartnett
23 Registered Professional Reporter
24

Public Hearing - March 24, 2021

\$	6	ahead 13:7
\$300,000 26:15	6 14:3	alignment 4:20
1	6.1 25:7,12	Allen 3:14 5:10 9:17 16:6,7,10,18,24 17:5 23:14 24:19 26:12,15 27:1,10,16 28:4,20 29:9,23
1 13:11 15:12,14	6:00 3:8	allocation 3:15 9:17,19,20 10:16 11:10 16:9 23:10,15 28:22,23 29:14
10 14:19 15:7	6:28 30:19,21	Allocations 9:7
11 14:23	7	allowed 10:13
12 13:9 15:2,12,14	7 14:6	amount 18:11
1A 13:12	7.5 25:5	amounts 21:16
1C 13:15	8	and/or 8:4
2	8 6:7 7:20 14:10	Anthony 18:9 25:23 26:5
2 13:17 24:20	81 25:6	app 23:21
20-day 11:11	8th 8:14 11:18 19:10 30:15	appeared 18:13
2018 21:24 26:13,14	9	appears 23:14
2019 21:24 23:20,23 24:2	9 14:13,18	Appendix 20:20
2020 14:17 24:10	9/11 10:12	applicable 16:20,21
2021 3:7 6:7 7:20 14:18	A	applicant 4:14 15:19,22
24 3:7 23:20	absence 21:4	application 3:14 4:20 6:14 7:14 8:21 11:24 12:4 13:11,18 16:8,19 17:2 20:13 21:17 23:8,10,19,24 24:9
25 23:22 24:1	accommodated 6:4	applications 5:10
3	acknowledged 4:18 7:4 18:22	appointed 3:17
3 13:17,20	active 29:8	April 6:7 7:20 8:14 19:10 30:15
30 24:10	acts 8:20	aquifer 10:18
30th 11:17	actual 11:20	Artesian 29:11
4	add 12:22	assessed 26:14
4 13:23	addition 5:6	assist 18:10
45 10:2	additional 5:9 7:6 23:17	Atalia 14:5
5	address 8:3 23:15	attachment 23:13 25:4
5 14:1	adhere 17:20	attempted 27:7
50 25:5	Administrative 5:13	attendance 19:17
525 10:5	advance 4:17	attending 5:7 30:18
54 10:3	advertised 11:12,20	attention 17:9
578 10:7	advised 5:17	audio 18:16,20 19:2
	affidavits 13:20 14:10,20 15:8	authentic 6:8
		automatically 18:20
		aware 28:6



Public Hearing - March 24, 2021

<p>awkward 20:14</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>B1a 13:13</p> <p>back 18:21 22:13 26:11</p> <p>barely 25:15</p> <p>Based 19:17</p> <p>bear 8:14</p> <p>begin 3:3 5:16 18:18 19:16,24 20:17 22:23 26:3 27:23</p> <p>behalf 15:22 16:6 17:4 20:10 23:2</p> <p>believes 16:10,18</p> <p>belong 28:2</p> <p>big 29:21</p> <p>bigger 28:15</p> <p>billion 10:5,7</p> <p>billions 21:16</p> <p>bird 25:3,5,12</p> <p>birds 25:5,6</p> <p>boxes 30:3</p> <p>branch 12:1</p> <p>bring 20:16</p> <p>build 6:13</p> <p>busy 3:5</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>calculated 25:9</p> <p>calculation 25:10</p> <p>Calendar 14:24</p> <p>call 12:12,20 20:14</p> <p>called 18:4</p> <p>capacities 11:8</p> <p>case 14:17</p> <p>Casper 12:19,22</p> <p>catching 26:21</p> <p>caught 26:20</p> <p>chat 7:1</p> <p>checked 27:5</p>	<p>checking 30:3,4</p> <p>chicken 29:22</p> <p>chickens 29:2</p> <p>citizen 26:19</p> <p>citizens 26:6</p> <p>Clean 21:8 23:5 26:6 28:3</p> <p>coalition 20:5 23:4</p> <p>Code 16:21</p> <p>Cohen 18:9 27:20,24 28:1 30:7</p> <p>Columbia 10:18</p> <p>comment 4:19,21 5:20 6:3 7:8,17, 21,24 8:10,23 9:16 11:14,17 13:23 14:1,4 17:11,14,22 18:6,16,23 19:2,9, 16,19,24 20:8 22:14,16,23 24:7,17 25:21 27:23 30:8,11,13,14,15</p> <p>commenter 19:10,20 27:20</p> <p>commenters 17:20 18:4,10 19:1 28:12</p> <p>comments 5:22 6:16 7:4,23 8:6 17:17,23 18:1 19:3,7 20:13 21:1 22:6 23:2,6 30:5</p> <p>commitment 16:13</p> <p>company 30:2</p> <p>complete 12:3</p> <p>completed 19:9</p> <p>complies 16:19</p> <p>comprehend 24:16</p> <p>concerned 26:7 28:14,15</p> <p>concise 17:23</p> <p>conclude 4:16 13:2 15:15 17:4 30:8</p> <p>concluded 17:8 30:19,21</p> <p>conclusion 4:11 5:15 7:5</p> <p>conduct 3:12 12:2</p> <p>conducted 4:1</p> <p>conducting 16:16</p> <p>confirmed 18:17</p> <p>confused 28:8</p> <p>connect 3:5</p> <p>connected 3:2</p> <p>Conservancy 27:4,6</p>	<p>conservation 13:15</p> <p>consideration 6:4 9:1</p> <p>considered 8:15</p> <p>consistent 21:17</p> <p>consisting 6:15</p> <p>consumers 22:10</p> <p>consumption 24:24</p> <p>consumptive 24:19,21</p> <p>contamination 22:2 26:8</p> <p>continuous 16:14</p> <p>control 3:12 11:1</p> <p>copper 22:2,7</p> <p>corporate 28:21</p> <p>correct 15:23,24 24:3</p> <p>correction 14:14</p> <p>corrosive 11:1</p> <p>count 18:14</p> <p>County 23:1 26:9</p> <p>court 4:22 6:10 19:3</p> <p>cover 21:23</p> <p>COVID-19 3:23</p> <p>creek 26:23</p> <p>current 9:20</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>data 13:15 21:22</p> <p>date 14:14 24:2</p> <p>dates 23:18,20</p> <p>day 9:22,24 11:9 17:16 21:15</p> <p>dealing 30:2</p> <p>December 11:18 21:23,24</p> <p>decided 28:19</p> <p>decision 6:22 7:11,12 8:16,17</p> <p>decisions 28:17</p> <p>declined 29:9</p> <p>dedicated 5:4,8</p> <p>deer 26:20</p>
--	--	---



Public Hearing - March 24, 2021

defer 29:10
deficiency 24:4
Delaware 11:12 13:21 14:21 16:21 20:5,9 28:1
Delaware's 3:11,22
Delcog 20:6,10
Department 3:11 4:8,13 7:12 8:13, 21 12:23 16:12 17:1 19:8
Department's 9:4 15:13,15 17:19, 21
desired 9:1
details 5:9
determining 12:2
difference 25:8 29:16
difficult 20:24
Dip 18:7 19:14,18
disconcerting 22:8
Division 9:3
DNREC 5:1,18 7:15 8:3,6,18 17:15 23:10,21 24:8,14 25:11 26:19 27:14, 15
DNREC's 3:21 4:21 5:14 6:24 17:13
DNRECHEARINGCOMMENTS@ DELAWARE.GOV 8:1
document 20:19 23:13
documentation 21:22
documents 21:13
drop 13:16
drought 25:14
due 3:23

E

e-mail 8:1
early 20:13
electronic 8:12
electronically 4:10 9:10 15:12
elephant 29:18,21
emergency 3:23 25:14
enable 8:20

enabled 7:16
encourage 5:6 25:20
encourages 19:8
end 18:19
ensure 6:2 7:16
enter 13:9
environment 22:11
environmental 3:12 23:3 27:3
environmentally 16:17
equally 8:15
established 17:18
estimate 25:13
estimated 24:18
evaluate 25:11
evening 3:1,9 9:5 26:4
event 4:10
eventually 6:17
exact 8:14
Excuse 24:7
Exhibit 13:11,12,13,17,20,23 14:1,6, 13,18,19,23 15:2,7
exhibits 6:17 13:5,7,9 15:11,13
existing 9:16 10:16
explained 11:7
extended 11:14
extension 24:11

F

Facebook 8:8
facilities 21:11
facility 9:18
fact 27:10
February 11:21 23:22 24:1
fee 23:22 24:1
feed 19:1
final 8:16
find 15:1 21:12
fine 26:15,16 27:11

fined 26:23
finish 19:7 30:13
fish 26:21
FOIA 23:9
Foods 3:14 5:11
foremost 3:24
form 7:24 23:10,11
formal 3:18 6:9 8:19 16:4
forward 22:15
found 5:12 21:7
fourth 18:8
frame 21:23
fundamental 26:10
future 30:5

G

gallon 25:12
gallons 9:21,23 10:2,3,5,7 21:15 25:2,5
Garvin 3:17 6:19 8:19 26:14 27:15 28:18
Garvin's 8:24
gathered 4:6
generate 4:6
generated 4:15 6:1 7:18
generic 25:15
good 3:1 9:5 26:4 28:20
Government 20:5
granted 19:11
grass 23:4 26:6
groundwater 10:20
group 26:7 27:4,6
groups 23:4
guidance 16:22

H

hand 9:2
handwritten 23:19



Public Hearing - March 24, 2021

<p>Harbeson 9:18</p> <p>Harim 3:14 5:11 16:6,7,10,18,24 17:5 23:14 24:19 26:12,15 27:1,10,16 28:5,20 29:9,23</p> <p>Harim's 9:18</p> <p>Health 23:3</p> <p>hear 20:1</p> <p>heard 30:1</p> <p>hearing 3:3,13,18,21,24 4:13,18,24 5:4,7,8,12,15,22,23 6:13,16,17,24 7:2,24 8:4,20 11:20 14:7,8,12,14,16 17:11,13,15,16 18:2 19:5 23:6 24:7 26:17 30:9,18,19</p> <p>hearings 5:19</p> <p>hey 28:24</p> <p>human 24:24</p> <p>hundred 9:21,23</p> <p>hydro 12:12,14</p> <p>hydrologist 12:5,15 28:10</p> <p>hydroxide 10:24</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>identified 21:2</p> <p>identity 18:17</p> <p>impacting 22:9,10</p> <p>implementing 16:13</p> <p>important 7:10 21:20</p> <p>improvement 16:15</p> <p>inaccuracies 21:12</p> <p>included 23:9</p> <p>including 17:22 23:4</p> <p>inclusion 7:17</p> <p>incorporated 5:24 19:4</p> <p>increase 9:19,22 10:6 23:15,16 29:10</p> <p>increasing 28:21,23</p> <p>independently 4:3</p> <p>indication 24:24</p> <p>industrial 10:13,22</p> <p>information 12:7 16:11 20:15 24:13, 22 25:16</p>	<p>instruction 7:7</p> <p>interrupt 25:19</p> <p>introductory 4:12</p> <p>invited 28:10</p> <p>involved 26:12</p> <p>iron 11:2</p> <p>issue 6:20 17:1</p> <p>issued 8:5</p> <p>issues 20:11,18 28:17</p> <p>item 21:18</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>January 21:24</p> <p>Jenna 14:4</p> <p>John 18:9 25:24</p> <p>joined 4:10</p> <p>joke 29:17</p> <p>Josh 12:19,22</p> <p>Journal 11:13 13:21 14:11,21</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>Keith 14:2 18:8 19:21 20:3 28:13</p> <p>kind 11:24 28:8</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>lastly 7:10 8:17 18:9</p> <p>latest 16:13</p> <p>Law 5:13</p> <p>lead 22:2,7</p> <p>legal 13:20 14:7</p> <p>letter 24:4</p> <p>letting 14:8</p> <p>level 20:14</p> <p>levels 22:3,7</p> <p>limit 17:24</p> <p>limited 5:21</p> <p>limiting 18:1</p>	<p>link 7:24</p> <p>list 4:6 19:17</p> <p>listed 5:14</p> <p>listening 27:9</p> <p>live 18:24 28:1</p> <p>LLC 3:15 5:11</p> <p>locate 10:13</p> <p>located 21:2</p> <p>location 10:11</p> <p>locations 4:4</p> <p>long 8:12 24:12</p> <p>loose 29:13</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>made 3:20 7:11,12 8:18 28:17</p> <p>make 12:2 16:5 21:1,19 29:15</p> <p>making 8:16 15:11 17:22</p> <p>Manager 9:6</p> <p>manner 16:17</p> <p>map 10:10,12,14 20:19,24 21:2,4,5</p> <p>maps 21:10</p> <p>March 3:7</p> <p>Maria 13:24 18:8 22:19,20,24 28:12</p> <p>mark 15:13</p> <p>marks 4:12</p> <p>materials 23:8,19 24:5,9,17</p> <p>math 30:4</p> <p>matter 4:15 5:4,9,21,23 6:1,5,22 7:18 8:5,18,22 18:1</p> <p>mechanism 8:20 25:10</p> <p>mechanisms 8:12</p> <p>media 8:7</p> <p>meeting 14:24 28:10</p> <p>mentioned 20:10</p> <p>messaging 8:9</p> <p>mid 21:24</p> <p>million 9:21,23 10:2,3,7 25:5,6</p> <p>millions 21:16</p>
--	---	--



Public Hearing - March 24, 2021

Milton 20:9 28:1
minutes 18:14,19 19:11
mispronounce 29:6
missed 15:6
missing 20:19
modification 23:7
Monday 24:10
month 10:2,4 21:15
Moore 15:21,24 16:2,3 17:3,6
move 15:19 18:21 19:20 22:15 25:23 27:19
moving 22:19
Murray 9:3,5,6 12:13,16,19,24 13:3, 4,8 15:5,8,17
mute 18:21 22:14

N

Natural 3:11
necessitated 3:22
needed 11:5 14:15
neighbor 28:21
Network 23:3
Newman 3:1,16 12:13,17,21 13:1,6 15:5,10,18 16:1 17:3,7 20:2 22:12 25:18 27:18 30:7
News 11:13 13:21,22 14:11,21,22
newspapers 11:12
noon 17:16
note 7:10 18:24
noted 8:12
notice 11:11,18,19 13:18 14:7,12
notices 8:4 14:20
November 11:17 24:10
NPDES 29:6,7
Number 14:3,10 15:7
numbers 28:22

O

objection 11:18,19

objectives 16:19
obtain 20:12
offer 4:19 6:3 7:3,16,21 17:10,14 18:5,22
offering 7:7 17:22
officer 3:18
Officer's 6:18
official 6:10
offset 27:3
one-week 24:11
ongoing 3:22
online 5:13
open 6:5 7:20 20:5 30:16
operations 16:16
opportunity 4:19 9:15 17:10 20:8
order 6:2,21 9:11 17:17 18:5
original 23:24 24:3
outstanding 27:11
overflowed 26:22

P

p.m. 3:8 30:21
package 20:21
paid 23:22 26:16 27:11
pandemic 3:23 9:12
part 21:14
participate 24:16
participating 4:3
Patty 9:6
Payan 13:24 18:8 22:20,24 25:18
percent 24:20
period 11:11,14,16 19:8
permit 3:13,15 9:17 11:7,11,24 16:9 17:1 23:8,12,18,21,22 24:1,8,17 26:11 27:9 29:7
permits 26:12
permitted 7:2
person 18:22

persons 4:17
pertinent 5:22
PH 10:24
physical 8:3
physically 4:5
picture 28:15
pipeline 29:11
place 5:18
plan 25:14
plans 13:16
plant 9:18
platform 3:10
platforms 8:7
Point 15:3
pollution 26:7
portion 7:5 30:9
Postal 8:2
posted 5:3
posting 14:24
potential 22:8
potentially 22:9,10
poultry 23:16
Power 15:2
practices 16:14
pre-registered 17:10,15
pre-registration 17:19
prepare 4:23
prepared 5:2
preregistered 4:17 7:3 18:3
present 4:7,23
presentation 5:16 7:5 9:4 12:23 13:2 15:3,16,20,22 16:2,4 21:5,14
presentations 4:14,16 17:8
presented 21:6
president 20:4
previously 7:15 8:5
prior 8:16 10:20,23 11:4 22:17
private 26:8



Public Hearing - March 24, 2021

problem 29:5
proceed 13:7 16:1
proceeding 3:19 4:8 6:6,9 7:6 8:19
process 6:21 17:19 20:12,13 25:3,4 29:2
processes 16:15
processing 25:6
produce 25:1
production 23:16
Program 9:6,7
project 10:10 27:3
proposed 4:20 5:10 6:14 7:13
protection 10:12
protocol 17:12
protocols 3:21 4:21 5:18 7:1 17:21
provide 3:9 4:14 9:4,15 15:7,20 19:2, 14,19 22:16 24:8,13 26:1 30:13,14
provided 4:19 7:8 20:15,20 23:8 24:5,12 25:17
providing 15:21 30:11
provisions 16:20
public 3:3,13 5:19 7:21 8:4,22 9:15 10:13 12:10 13:18,23 14:1,4,6,13,20, 23 17:13 20:12 23:9 24:6,7,9,13,15, 17 25:11 30:8,11
published 28:19
pump 13:13
purpose 6:12 9:14
pursuant 4:24
put 11:11

Q

question 26:10 27:13
questions 21:21

R

rates 13:14 23:14
read 24:16
readvertised 14:16

ready 3:2
reaffirms 16:12
reason 19:12
reasons 6:23
receipt 23:18,20 24:2
receipts 23:21
receive 15:11
received 5:5,20 8:11,13 11:16,17 13:24 14:2
record 4:9,15 5:24 6:5,8,13,15 7:18, 19 13:9 15:6 19:5,24 22:1,22 25:22 26:2 27:22 30:16
reduce 24:15
reduction 11:1
regard 7:13 17:21
regulations 16:22
regulatory 11:23
reliability 25:12
remain 5:18 6:5 7:19 30:16
remember 8:10
reminding 9:9
renewal 3:15 9:16 13:19 16:8 23:7, 12
Report 6:18
reporter 4:22 19:4
reporter's 6:10
reports 13:13,14
represent 26:5
representing 19:16,23 22:22 26:2 27:22
request 23:6
requested 13:14 16:11 23:13
requesting 9:19 16:8 23:14
requests 17:1
requirement 5:1
requirements 16:20
rerun 14:20
resident 20:9 23:1
Resources 3:11

respectfully 16:24
respecting 17:24
respective 4:4
respond 27:15
response 23:9 24:6
result 17:18
review 6:21 11:23 12:2,5
reviewed 6:18
Robert 18:7 19:14,18
room 4:2 29:22
roots 23:4 26:6
rule 26:20
run 10:24 22:4
rural 26:8

S

sampling 21:22
Scarpa 18:9 25:24 26:4,5 27:18 28:16
schedules 3:5
screen 12:9 18:13
screened 10:18
season 26:20
Secretary 3:17 6:19,20 8:16,19,24 26:14 27:14 28:18
Secretary's 6:4
section 5:13 12:5
SEN 28:2
septic 26:22
serve 3:17
served 24:14
Service 8:2
session 7:2
set 16:22 17:2,12
severely 24:15
Shawn 27:15
sheet 25:10
Shelly 18:9 27:20,24



Public Hearing - March 24, 2021

<p>short 21:23</p> <p>shot 26:20</p> <p>shows 21:14 22:1 23:22</p> <p>similar 20:18</p> <p>site 10:14</p> <p>situation 28:5 29:11</p> <p>slack 26:24</p> <p>slaughtering 29:2</p> <p>slide 9:7,9,13 10:9,15 11:10,22 12:6</p> <p>slides 21:6</p> <p>social 8:7</p> <p>sodium 10:24</p> <p>sold 30:1</p> <p>solely 5:21</p> <p>sound 16:17</p> <p>speak 7:4 18:7 19:12</p> <p>speaker 19:6</p> <p>speaker's 18:15,16,20</p> <p>speaking 20:4,10 28:11</p> <p>staff 4:13</p> <p>stamp 24:2</p> <p>standard 3:21 4:21 6:24</p> <p>standards 16:22</p> <p>stapled 23:21</p> <p>state 3:10,22 11:13 13:21 14:11,21 19:22 22:21 27:21</p> <p>stated 7:15 22:17</p> <p>statement 16:5 17:4</p> <p>states 24:19</p> <p>Statewide 14:23</p> <p>statutory 5:1 6:12</p> <p>Steck 14:2 18:8 19:21 20:1,3,4 22:12</p> <p>story 28:9</p> <p>stream 26:23</p> <p>subject 5:21,23 18:1</p> <p>submission 21:9</p> <p>submissions 21:8</p> <p>submit 19:9 22:6,18 25:20</p>	<p>submitted 3:14 5:10 7:23 8:7,24 13:16 14:4 16:7 23:5 24:1</p> <p>submitting 23:2 30:5</p> <p>subsequent 23:17</p> <p>supplied 16:11</p> <p>supposed 20:20 26:21 27:2</p> <p>Sussex 23:1,2 26:9</p> <p>sync 10:24</p> <p>system 26:22</p> <hr/> <p>T</p> <hr/> <p>tail 29:19</p> <p>taking 3:4</p> <p>technology 16:14</p> <p>test 13:13,14 21:22</p> <p>text 8:8</p> <p>Thanksgiving 11:15</p> <p>therefor 6:23</p> <p>Theresa 3:16 9:8 12:8</p> <p>thereunder 16:23</p> <p>thing 29:24</p> <p>things 11:1,2 29:13,15</p> <p>thinks 29:20</p> <p>thousand 9:21,23</p> <p>three-minute 17:24 19:7 25:19</p> <p>Thursday 6:7 7:20 30:15</p> <p>time 3:4,8 7:9 11:16 17:24 18:11 19:8,11 21:23 22:5,12 24:14,15 27:5, 17</p> <p>timer 18:12,18 25:19</p> <p>titled 23:13</p> <p>today 3:6,7</p> <p>tonight 4:6 5:17 6:9,14 7:8,13 9:11, 14 12:12 17:17 27:9 28:11 29:15 30:13,18</p> <p>tonight's 3:18 5:7,15,22 6:6,12,15 7:6 17:11 30:9</p> <p>Tony 28:13</p> <p>total 24:20 25:8</p> <p>touch 24:18 25:2</p>	<p>touching 29:18,19</p> <p>transcribed 19:3</p> <p>transcript 4:24 5:3 6:11,16</p> <p>treatment 10:19,23 11:4 24:23 29:10</p> <p>trunk 29:19</p> <p>turn 17:9 18:15</p> <p>turning 4:12</p> <p>Twitter 8:8</p> <p>type 24:22</p> <hr/> <p>U</p> <hr/> <p>U.S. 8:2</p> <p>ultimate 8:17</p> <p>ultimately 6:20</p> <p>understand 21:10</p> <p>unit 10:20,23</p> <p>unmute 19:14</p> <p>unmuted 18:16 19:22 22:21 26:1</p> <p>unresolved 28:16</p> <p>updated 14:13</p> <p>USPS 8:11</p> <hr/> <p>V</p> <hr/> <p>valid 29:7</p> <p>verbal 7:4,7 17:4,11,14,22 18:5</p> <p>verbatim 4:23 6:10</p> <p>versus 23:7</p> <p>vet 8:21</p> <p>vice 20:4</p> <p>video 19:1</p> <p>violated 26:19</p> <p>virtual 3:3,10,13 5:23 17:14 18:12 30:18</p> <p>virtually 4:1,7,22 9:10</p> <p>visit 5:8</p> <p>visited 12:10</p> <p>visual 18:12</p>
---	--	--



Public Hearing - March 24, 2021

W

wastewater 11:4

water 3:15 9:3,16 13:15 16:8 23:10,
15,17 24:23 25:1,3,8 28:22 29:1,10,
11,14

ways 8:23 22:17

Webex 4:6

webpage 5:4,8,12 7:24 8:4 12:11

website 5:14 13:10

Wednesday 3:7

weight 8:14

wellhead 10:11

wells 10:14,16,17,21 21:3,8 23:5
26:6,8 28:2

wishes 6:3 7:15

wishing 17:13

withdrawal 24:20

withdrawn 24:23

workers 22:9

writing 19:9 22:6

written 6:16 7:21 8:6 11:16 22:16
25:21 30:14

wrong 14:15 28:23

Y

year 10:6,8 14:15 21:15,16

years 27:12 28:5,7

Youtube 8:8

